

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

SHANNON GIBSON,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 17-3255
)	
GREENE COUNTY, et al.)	
)	
)	
Defendants.)	

MOTION TO STAY

COME NOW, separate Defendants Greene County, Missouri, Sheriff Jim Arnott, and Lt. “Mays,” jointly referred to herein as (“the Greene County Defendants”) by and through their attorneys of record, Keck & Austin, LLC, and for their Motion To Stay asserts the following:

1. Defendants Greene County, Sheriff Jim Arnott and Lt. “Mays,” mailed an Offer of Judgment to counsel for plaintiff on or about August 24, 2017.
2. The Offer of Judgment was sent via certified mail to the address on record with this Court; 3025 E. Hawkins, Springfield, Missouri, 65804.
3. The Offer of Judgment was returned to counsel for defendants marked “Return to Sender, No Such Street, Unable to Forward.”
4. Defendants move the Court to stay this case until counsel for plaintiff provides this Court current contact information.

Wherefore, defendants respectfully move the Court enter its Order staying this case for the reasons stated above and for such further and additional relief as the Court deems just.

Respectfully submitted,

KECK & AUSTIN, LLC

By: /s/ Patricia A. Keck

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Attorneys for Greene County Defendants

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing Motion to Stay was served via electronic filing, this 19th day of September, 2017 to:

lacomelaw@gmail.com
Mr. Joseph LaCome
3025 E. Hawkins
Springfield, MO 65804

/s/ Patricia A. Keck

Patricia A. Keck